

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI

IN RE:	)	
	)	
INTERSTATE UNDERGROUND WAREHOUSE	)	
AND INDUSTRIAL PARK, INC.	)	Case. No. 21-40834
	)	Chapter 11
Debtor.	)	

**OBJECTION TO CLAIM**

Comes now Movant Interstate Underground Warehouse and Industrial Park, Inc., and hereby objects to the Proof of Claim filed by creditor Adam N. Leon dba Lion's Plumbing, in the amount of \$20,885.41, and filed on August 26, 2021. The court claim number is #11.

**Your claim may be reduced, modified, or eliminated. You should read this document carefully and discuss it with your attorney, if you have one.**

Pursuant to Local Rule 3007-1 (C), the Claimant shall have 30 days after service of the Objection in which to file a Response, if you do not want the court to eliminate or change your claim. The Response shall be in writing and state why the claim should be allowed as filed. If a Response is filed, the Court will schedule a hearing. If no timely Response is filed, the Court will enter an Order sustaining the Objection to the Claim. Parties not represented by an attorney shall mail a Response to the Court at **U.S. Bankruptcy Court, 400 E. 9<sup>th</sup> St., Room 1510, Kansas City, MO 64106**. Debtor(s) not represented by an attorney must be served a copy of the Response by regular mail. If your Response is mailed, it must be early enough so that the court will receive it on or before 30 days after service of the Objection.

The basis for the objection is as follows:

☒ The claim should be allowed or disallowed as follows:

The claim consists of a total of \$20,885.41. The Movant has no objection to the work performed on June 2, 2019 totaling \$8,585.41 but does object to the alleged work charged of \$12,300. Movant does not believe that the \$12,300 listed for May 29, 2019 through March 20, 2020 was authorized or performed.

Dated: January 31, 2022

KRIGEL & KRIGEL, P.C.

/s/ Erlene W. Krigel  
Erlene W. Krigel, MO #29416  
4520 Main St., Ste. 700  
Kansas City, MO 64111  
Telephone: (816) 756-5800  
Fax: (816) 756-1999  
Email: ekrigel@krigelandkrigel.com  
ATTORNEYS FOR DEBTOR

### **CERTIFICATE OF SERVICE**

I Erlene Krigel hereby certify that a true and correct copy of the Objection to Claim was mailed to Adam N. Leon dba Lion's Plumbing, by first class mail this 31st day of January, 2022:

Adam Leon dba Lion's Plumbing  
2115 Belleview  
Kansas City, MO 64108

Betsy Lynch, Esq.  
Lynch Sharp & Associates LLC  
9229 Ward Parkway, Suite 370  
Kansas City MO 64114

And to all interested parties received notice electronically via the court's Electronic System.

Dated: 1/31/2022

/s/ Erlene W. Krigel  
Erlene W. Krigel

**Court address: U.S. Bankruptcy Court, 400 E. 9th St., Room 1510, Kansas City, MO 64106**

**Instructions: Complete all parts of the form and serve on the affected parties**

ECF Event: Bankruptcy>Claim Actions>Objection to Claim (includes 30-day notice)